

## REMARKS

Claims 46-87 were previously pending in this patent application. Claims 46-87 stand rejected. Herein, Claims 46, 53, 61-63, 65-66, 70-75, and 79-87 have been amended. Support for the amendments may be found in, but not limited to, line 5 of page 8 to line 20 of page 9 of the Specification. Accordingly, after this Amendment and Response, Claims 46-87 remain pending in this patent application. Further examination and reconsideration in view of the claims, remarks, and arguments set forth below is respectfully requested.

### 35 U.S.C. Section 102(b) Rejections

Claims 46-53, 61-63, and 66-74 stand rejected under 35 U.S.C. 102(b) as being anticipated by Tsushima et al., U.S. Patent No. 6,044,450 (hereafter Tsushima). These rejections are respectfully traversed. It is not conceded that Tsushima is in fact prior art with respect to the present application. The option to antedate the Tsushima reference is hereby reserved.

Focusing on Independent Claim 46, it is respectfully submitted that Tsushima fails to disclose all the features of Independent Claim 46. In particular, Independent Claim 46 is directed to a method and recites in part, “responsive to a trigger pattern in said first machine language instruction, modifying said instruction segment to form a second machine language instruction, wherein said trigger pattern can be located in any portion of said first machine language instruction,” (emphasis added). On page 2 of the Office Action, it is alleged that

the group code field 10A of Tsushima's Figure 2C and the preload instruction OPC field 16 of Tsushima's Figure 2D correspond to the trigger pattern of Independent Claim 46. According to col. 6, line 1 to col. 7, line 6, of Tsushima, compressed VLIW instructions are fetched and decompressed/expanded, whereas small instructions constituting the decompressed/expanded VLIW instruction are supplied to functional units to perform an operation designated by the small instruction. Further, "FIG. 2C shows the format of a VLIW instruction 100b obtained by compressing in space one time-compressed VLIW instruction having the format shown in FIG. 2B," (emphasis added). (Col. 7, lines 54-56).

Continuing, col. 8, lines 15-28, provide details concerning the format of the compressed VLIW instruction 100b of Tsushima's Figure 2C. In particular, "the field 21 of the grouped instruction shown in FIG. 2C includes: a sub-field 10A for setting a group code obtained by compressing the OP codes of the small instructions 1a and 2a; an operand sub-field 11A for setting the operands 11a and 11b of the small instruction 1a; a sub-field 12A for setting the NOP number of the small instruction 1a; an operand sub-field 11B for setting the operands 11a and 11b of the small instruction 2a; and a sub-field 12B for setting the NOP number of the small instruction 2a." While the format of the compressed VLIW instruction 100b specifies the location of the group code field 10A in the compressed VLIW instruction 100b, the trigger pattern of Independent Claim 46 can be located in any portion of the first machine language instruction.

Further, col. 14, lines 27-38, describe details concerning the format of the VLIW instruction 100c of Tsushima's Figure 2D. "FIG. 2D shows a long instruction 100c containing a preload instruction 16 for the instruction expanding circuit 300a. In this long instruction 100c, the preload instruction 16 is contained in the instruction field 21 of the LD/ST group. The operand sub-fields of this preload instruction are set with the start address 17b of an area (block) in the main storage to be loaded (in this example, the start address (sub-field 17) of the instruction table 30A) and the number (sub-field 18) of entries to be loaded." While the format of the VLIW instruction 100c specifies the location of the preload instruction OPC field 16 in the VLIW instruction 100c, the trigger pattern of Independent Claim 46 can be located in any portion of the first machine language instruction.

As a result, the group code field 10A of Tsushima's Figure 2C and the preload instruction OPC field 16 of Tsushima's Figure 2D do not correspond to the trigger pattern of Independent Claim 46. Tsushima fails to disclose all the features of Independent Claim 46. Therefore, Independent Claim 46 is not anticipated by Tsushima and is in condition for allowance.

Dependent Claims 47-52 are dependent on allowable Independent Claim 46, which is not anticipated by Tsushima. Hence, it is respectfully submitted that Dependent Claims 47-52 are not anticipated by Tsushima and are in condition for allowance for the reasons discussed above.

With respect to Independent Claims 53, 61, and 66, it is respectfully submitted that Independent Claims 53, 61, and 66 are not anticipated by Tsushima for the reasons discussed with respect to Independent Claim 46. Independent Claims 53 and 61 recite in part, “wherein said trigger pattern can be located in any portion of said first machine language instruction,” (emphasis added). Independent Claim 66 recites in part, “wherein said trigger pattern can be located in any portion of said stored very long instruction word,” (emphasis added). On pages 3 and 4 of the Office Action, it is alleged that the group code field 10A of Tsushima’s Figure 2C and the preload instruction OPC field 16 of Tsushima’s Figure 2D correspond to the trigger pattern of Independent Claims 53, 61, and 66. As discussed with respect to similar features of Independent Claim 46, Tsushima fails to disclose the cited features of Independent Claims 53, 61, and 66. Therefore, it is respectfully submitted that Independent Claims 53, 61, and 66 are not anticipated by Tsushima and are in condition for allowance for the reasons discussed above.

Dependent Claims 62-63 and 67-74 are dependent on one of allowable Independent Claims 61 and 66, which are not anticipated by Tsushima. Hence, it is respectfully submitted that Dependent Claims 62-63 and 67-74 are not anticipated by Tsushima and are in condition for allowance for the reasons discussed above.

### 35 U.S.C. Section 103(a) Rejections

Claims 54-60, 64, 65, and 75-87 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Tsushima et al., U.S. Patent No. 6,044,450 (hereafter Tsushima). These rejections are respectfully traversed.

Dependent Claims 54-60, 64, and 65 are dependent on one of allowable Independent Claims 53 and 61, which are patentable over Tsushima for the reasons discussed above. Hence, it is respectfully submitted that Dependent Claims 54-60, 64, and 65 are patentable over Tsushima and are in condition for allowance for the reasons discussed above.

With respect to Independent Claims 75 and 79, it is respectfully submitted that Independent Claims 75 and 79 are patentable over Tsushima for the reasons discussed with respect to Independent Claim 46. Independent Claim 75 recites in part, “wherein said trigger pattern can be located in any portion of said machine language instruction,” (emphasis added). Independent Claim 79 recites in part, “wherein said trigger pattern can be located in any portion of said instruction word,” (emphasis added). On pages 8 and 9 of the Office Action, it is alleged that the group code field 10A of Tsushima’s Figure 2C and the preload instruction OPC field 16 of Tsushima’s Figure 2D correspond to the trigger pattern of Independent Claims 75 and 79. As discussed with respect to similar features of Independent Claim 46, Tsushima fails to disclose the cited features of Independent Claims 75 and 79. Moreover, there is no teaching, motivation, and suggestion to modify Tsushima to provide the cited features of Independent

Claims 75 and 79. Therefore, it is respectfully submitted that Independent Claims 75 and 79 are patentable over Tsushima and are in condition for allowance for the reasons discussed above.

Dependent Claims 76-78 and 80-87 are dependent on one of allowable Independent Claims 75 and 79, which are patentable over Tsushima. Hence, it is respectfully submitted that Dependent Claims 76-78 and 80-87 are patentable over Tsushima and are in condition for allowance for the reasons discussed above.

### CONCLUSION

It is respectfully submitted that the above claims, arguments and remarks overcome all rejections and objections. All remaining claims (Claims 46-87) are neither anticipated nor obvious in view of the cited references. For at least the above-presented reasons, it is respectfully submitted that all remaining claims (Claims 46-87) are in condition for allowance.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

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Respectfully submitted,

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